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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

Grupo Aeromexico, S.A.B de C.V., et al.,

Case No. 20-11563

Debtors.

Jointly Administered

_____ /

**RESPONSE OF ALLIANCE GROUND INTERNATIONAL, LLC AND
CARGO SECURITY COMPANY TO DEBTOR'S SEVENTEENTH
OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM**

Alliance Ground International, LLC and Cargo Security Company (individually “AGI” and “CSC,” and collectively, the “Creditors”) submit the following as their response (the “Response”) to the “*Debtor’s Seventeenth Omnibus Claims Objection to Proofs of Claim*” (the “Objection”) [DOC 1593]. In support of the Motion, the Movants state as follows:

INTRODUCTION

1. The Creditors provide cargo handling services to the Debtors.¹
2. The Creditors provided such services prepetition and have continued to provide such services on a postpetition/administrative basis.

¹ The term “Debtors” shall be used to collectively refer to the four Aeromexico debtors whose cases are being jointly administered in the instant bankruptcy case.

3. Both Creditors provided services to the Debtors and both Creditors were owed money by the Debtors on the petition date.

4. Both Creditors filed proofs of claim certain of which are the subject of the Objection.

The Claims and Objections

5. AGI and CSC filed the following claims:

Claim No.	Creditor	Debtor	Amount
10295	AGI	Aerovias Empresas	\$65,634.92
13437	AGI	Grupo Aeromexico	\$65,634.92
13438	AGI	Aerovias de Mexico	\$65,634.92
13441	AGI	Aerolitoral	\$65,634.92
13453	CSC	Aerovias Empresas	\$65,634.92
13446	CSC	Grupo Aeromexico	\$65,634.92
13450	CSC	Aerovias de Mexico	\$65,634.92
13451	CSC	Aerolitoral	\$65,634.92

6. The Debtors objected to the claims 13437, 13446, 13441, and 13451 asserting that they are duplicative.

The Objections Should be Overruled and/or Adjourned

7. AGI and CSC are related entities and provided (and continue to provide) services collectively to the Debtors.

8. Invoicing for such services was primarily handled by AGI however certain invoices were issued in the name of CSC.

9. Further, it appears that the services may have been provided to more than one entity.

10. Accordingly, claims were filed on behalf of each entity and against each of the Debtors.

11. The Creditors acknowledge that each of the claims will not be subject to allowance in full, as the balances due to each Creditor and owed by each Debtor need to be reconciled.

12. Pending such reconciliation, the Creditors assert that the Objection should be overruled because the claims are not duplicative, i.e., amounts are owed to both Creditors.

13. Alternatively, the Creditors further assert that the Objection should be adjourned so the parties may work together to reconcile the claims and determine the proper allowance of same.

14. To that end, the Creditors and the Debtors have been working for the past few months to reconcile the claims and are nearing the end of that process.

CONCLUSION

WHEREFORE, the Creditors respectfully request that this Court enter an Order (a) overruling the Objection or alternatively adjourning same so the parties may work together to reconcile the amounts of the claims, and (b) granting such further relief as the Court deems just and proper.

Dated: September 17, 2021
Fort Lauderdale, Florida

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By: /s/ Ross R. Hartog
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